

EXHIBIT A

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: _____

CIVIL COMPLAINT

Magisterial District Number:	23-2-04
MDJ Name: Hon.	Nicholas Bentz
Address:	1786 Welsh Road Mohnton, PA 19067
Telephone:	

PLAINTIFF: NAME and ADDRESS

Debby Bohne
148 Merion Lane
Reading, PA 19067

VS.

DEFENDANT: NAME and ADDRESS

GC Services, LP
6330 Gulfm Street
Houston, TX 77081

Docket No.: CV-13-13

Date Filed:



RECEIVED

MAY 20 2013

LAW DEPT.

	AMOUNT	DATE PAID
FILING COSTS	\$ 105.50	/ /
POSTAGE	\$ 0.00	/ /
SERVICE COSTS	\$ 10.00	/ /
CONSTABLE ED.	\$ 0.00	/ /
TOTAL	\$ 115.50	05/10/13

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Social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account number must be established, list only the last four digits. 204 Pa. Code §§ 213.1 - 213.7.

Pa.R.C.P.D.J. No. 206 sets forth those costs recoverable by the prevailing party.

TO THE DEFENDANT: The above named plaintiff(s) asks judgment against you for \$ 3,000.00 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

Defendant violated the Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. Section 1692 et seq. when it left messages on Plaintiff cell phone. The phone calls messages occurred when Plaintiff was in this township. The messages left were in violation of 15 U.S.C Section 1692e(11) and case of Foti v. NCO Financial Systems. Defendant, called third parties requesting information other than location. in violation of 15 U.S.C. Section 1692d, 1692b, 1692c(b), 1692(5), 1692e(10) and 1692f. The voice recordings will be produced at trial as will the case of Foti v. NCO Financial Systems. In accordance with 15 U.S.C Section 1692k, statutory damages are \$1,000 per 1692k(3) and \$2000 attorney fees.

I, [Signature], do hereby declare under oath that the facts set forth in this Complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.

The plaintiff's attorney shall file an entry of appearance with the magisterial district court pursuant to Pa.R.C.P.M.D.J. 207.1.

IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, YOU SHOULD SO NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT MAY BE ENTERED AGAINST YOU BY DEFAULT.

If you have a claim against the plaintiff which is within magisterial district judge jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.